

quinn emanuel trial lawyers | washington, dc

51 Madison Ave, 22nd Floor, New York, New York 10010 TEL (212) 849 7000 FAX (212) 849 7100

November 2, 2023

VIA ECF

Honorable Katherine Polk Failla
Thurgood Marshall
United States Courthouse
40 Foley Square, Room 618
New York, New York 10007

Re: In Re CT Group Holdings Limited, Case No. 1:23-MC 00403

Dear Judge Failla:

We write on behalf of Petitioner CT Group Holdings Limited (“CT Group” or the “Petitioner”) to respectfully request that the Court temporarily seal Petitioner’s *Ex Parte* Application And Petition For An Order To Conduct Discovery For Use In Foreign Proceedings Pursuant To 28 U.S.C. § 1782 (the “Application”). Dkt. No. 1. Since filing the Application, Petitioner has learned that the party adverse to Petitioner in the foreign proceedings discussed in the Application (the “Adverse Party”) has alleged that the Application and related Declarations and Exhibits contain confidential information pertinent to Adverse Party. Given the allegation of confidentiality, Petitioner requests that this Court temporarily seal Petitioner’s Application, Dkt. No. 1, Petitioner’s Memorandum of Law in Support of Petitioner’s Application, Dkt. No. 3, and the Declarations submitted in Support of Petitioner’s Application, Dkt. Nos. 4–6.

Petitioner will provide a more fulsome explanation of why sealing is necessary in a Letter Motion to Seal, as well as appropriately redacted versions of the relevant papers, as soon as possible.

Respectfully Submitted,

/s/ Lucas Bento